

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi

Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-2 Provide a copy of VZ-MA's "Outside Plant Engineering guidelines"
(1998-000397) dated July, 1998.

REPLY: Please see Verizon MA's response to Information Request ATT 3-5.

VZ # 276

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-3 Provide a copy of VZ-MA's "Outside Plant Engineering guidelines"
(1998-000397) dated July, 1998.

REPLY: This is a duplicate question of Information Request CC 3-2.

VZ # 277

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-5 Please provide a copy of all business process and policy documentation used to determine the need for loop conditioning (if not part of the response to the above data request).

REPLY: This is a duplicate question of Information Request CC 3-4.

VZ # 279

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-6 Please provide all technical instructions, processes and policies documentation used by field technicians during loop conditioning activities (if not part of the response to the above data requests).

REPLY: Verizon-MA objects to this request on the basis that it is overly broad and burdensome. Notwithstanding this objection, Verizon MA provides the following response.

There are no specific instructions relative to "loop conditioning" (i.e., removal of load coils or bridge tap). These work activities involve steps that are typically performed in the course of many everyday work operations such as setting up work site protection, opening splice cases, splicing or re-splicing pairs etc. and are covered separately in variety of Verizon practices and handbooks. No concise summation or index of practices and instructions solely related to the above requested activity exists. Also, please see Verizon MA's response to Information Request CC 3-15.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-7 Please provide the inventory of equipment used by loop conditioning field technicians, including personal tools, test equipment and vehicle mounted and or vehicle transported equipment.

REPLY: Verizon MA's Field Technicians do not normally perform loop conditioning. However, depending on the job function, Verizon MA's I&M, Splicing, or Construction technicians may use any of the following, in addition to typical hand tools.

These include a 8455 L1 KS Meter or a Side Kick Meter, a Hand Held Talk Set, Load Detector, Time Domain Reflectometer –TDR; or Optical TDR T1 Bit Error Rate Tester – T-Bird, Cable Shears, Pic-a-Bond Tool

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D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-11 Please provide copies of engineering and operations policy documentation used to determine line splitter central office floor space locations and line splitter shelf locations within relay racks and equipment densities when ILEC owned line splitters are used.

REPLY: Verizon MA does not own splitters. Furthermore, no such documentation exists.

VZ # 285

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-12 Please provide a list of the last twelve months of all vendors who perform loop conditioning services for VZ-MA.

REPLY: Verizon MA does not employ contractors to perform loop conditioning (i.e., load coil or bridge tap removal)

VZ # 286

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-13 Please provide copies of the last twelve months of loop conditioning requests made by Verizon to vendors/contractors for loop conditioning work.

REPLY: Please see Verizon MA's response to Information Request CC 3-12.

VZ # 287

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-14 Please provide copies of invoices from vendors/contractors to Verizon for payment of the loop conditioning requests referenced above.

REPLY: Please see Verizon MA's response to Information Request CC 3-12.

VZ # 288

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-15 Please provide a copy of VZ-MA's current Outside Plant Handbook, and a copy of any predecessor handbook in use since January 1, 1997.

REPLY: Verizon MA objects to this request on the grounds of that it is unduly burdensome. Notwithstanding this objection, Verizon MA provides the following response.

Verizon MA considers the requested information to be proprietary and competitively sensitive, and voluminous. This information will be made available for review by parties at the Company's offices at 125 High Street, Boston, Massachusetts, at a mutually agreeable time, and subject to a mutually agreeable Protective Agreement.

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D.T.E. 01-20 (Part A)

Respondent: John Livecchi

Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-16 Please provide a copy of VZ-MA's Technicians Guide Book and I&M Technicians Guide Book.

REPLY: Please see Verizon MA's response to Information Request CC 3-15.

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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-19 For each VZ-MA database/system that contains or was designed to contain information that VZ-MA believe is relevant to the qualification of unbundled loops for DSL service, please indicate if it is possible to provide remote read only access to that database.

REPLY: CLECs have read only access to the loop qualification database. Through the normal Change Management process, it is anticipated that CLECs will have read-only access to loop makeup information in LFACS in October, 2001.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-20 For each VZ-MA database/system that contains or was designed to contain information that VZ-MA believe is relevant to the qualification of unbundled loops for DSL service, please indicate if VZ-MA's field personnel have any means to obtain remote access to that data source.

REPLY: The only information that is available to a Technician remotely is LFACS information obtained by the technician via the Intelligent Field Access System IFAS Hand Held Terminal.

The cable information provided is only candidate pairs for use, and whether or not the assigned pairs are defective or otherwise not suitable for use. The information is not a list of conditioned pairs. The Technician follows the normal procedures during the Provisioning or Maintenance of the loop to verify that the new assigned pairs meet the requirements for the service being provided.

The information also contains the recorded list of field termination points of the individual cable facilities.

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D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-21 What charge, if any, could a CLEC impose on VZ-MA if VZ-MA wins a CLEC xDSL customer after that CLEC paid VZ-MA to have the customer's loop manually qualified and/or conditioned?

REPLY: Once Verizon MA conditions a loop, no further charges for the same type of conditioning should apply.

VZ # 295

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-28 Please provide for the past 5 years, the telephone subscribership penetration rate in Massachusetts. Please provide all documentation and materials supporting your response.

REPLY: Please see Verizon MA's response to Information Request CC 2-54.

VZ # 302

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-29 Please provide the current average number of distribution pairs per residence and business in Massachusetts. Please provide all documentation and materials supporting your response.

REPLY: Please see Verizon MA's response to Information Request CC 2-55.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael Anglin
Title: Director – Service Costs

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-30 Please provide the annual charge factors for buried, aerial, and underground copper used in the most recently Commission approved unbundled network element cost case in Massachusetts.

REPLY: Please see Verizon MA's response to Information Request CC 2-56.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-31 Please provide the total number of VZ-MA unbundled copper loop orders placed in Massachusetts that have required loop modification services. Please provide this information separately for 1998, 1999 and 2000.

REPLY: This is a duplicate question to Information Request CC 2-57.

VZ # 305

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-32 Does VZ-MA provide a “loop qualification system” (LQS) for use by network service providers or other customers who utilize its xDSL services?

REPLY: Verizon MA provides a loop qualification database which is available to CLECs who provide xDSL services.

**Verizon New England Inc.
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D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-33 If the answer to the above question is anything other than an unequivocal “no,” please describe VZ-MA’s LQS system in detail. Your complete answer will, at a minimum, describe the following:

When a customer uses the LQS system, what information is returned to the customer after LQS has determined the extent to which a particular facility is suitable for VZ-MA’s xDSL service? If information other than a “positive” or “negative” response is returned, please provide a copy of such as a response.

b. Is LQS available for facilities to which a currently subscribed telephone number is assigned?

If LQS returns a positive response regarding a particular facility, can the customer be guaranteed that he/she will not incur a charge for loop modification to receive xDSL services?

REPLY: The loop qualification system can be queried based on a customer’s telephone number. The data in the database is based on the MLT results of a sample of loops terminated at the same terminal as the loop for the telephone number provided. It is not the MLT results for that particular loop. The database query verifies whether or not there are some qualified pairs at the serving terminal.

The response provides, loop length, if the loop is served by DLC, and if T-1 interferers or load coils are present.

**Verizon New England Inc.
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D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-36 Please specifically identify every service that VZ-MA will provide or asset or right it will offer to itself or any xDSL retailing affiliate, that it will not provide or offer on the same terms and conditions to unaffiliated firms providing xDSL service, and that is related to any of the following:

- a. Provision or collocation of splitters;
- b. Augmenting cabling or splitter capacity to provide line
Please provide any scripts for use in sales or promotions or internal sales procedures provided to employees or agents of VZ-MA or VZ-MA affiliates that market retail xDSL services of VZ-MA.sharing;
- c. Access to shared physical loops for testing;
- d. Access to wideband test systems;
- e. Access to fiber feeder facilities;
- f. Placement of DSLAMs at remote terminals;
- g. Access and interconnection to subloops;
- h. Access and interconnection to dark fiber;
- i. Access to packet switching facilities;

For each service, asset or right so identified, state why VZ-MA will not provide or offer it to an unaffiliated firm at the same terms, conditions or pricing as it provides or offers it to an affiliate, and specifically describe all differences between the terms, conditions or pricing offered to the VZ-MA affiliate and the unaffiliated firm.

REPLY: Please see Verizon MA's responses to CC 3-39, CC 3-40, and CC 3-42.

**Verizon New England Inc.
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D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-37 Please provide any scripts for use in sales or promotions or internal sales procedures provided to employees or agents of VZ-MA or VZ-MA affiliates that market retail xDSL services of VZ-MA.

REPLY: Verizon MA objects to this request on the grounds that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

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**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director FCC & Regulatory Support

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-38 Does VZ-MA believe or plan additions to its facilities on the basis that all retail xDSL demand which is met by its own retail offerings (or those of an affiliated provider), will be provisioned over all-copper loops (*i.e.*, loops that do not include fiber feeder facilities) through at least 2002? Please provide a complete description of the basis for VZ-MA's response.

REPLY: No. VZ-MA does not plan to augment the existing embedded base of copper facilities to only provide additional capacity for xDSL demand. xDSL can share a facility with POTS services. Copper feeder additions are triggered by demand for POTS, special switched and non-switched services within a short distance from the serving central office.

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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-39 Will VZ-MA allow a data affiliate *any* form of access to information that is not available to all providers of xDSL service concerning its current or planned deployment of outside plant equipment or other tangible and intangible assets? If the answer to this request is anything other than an unqualified “no,” please provide a detailed explanation.

REPLY: No.

VZ # 313

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-40 Please provide a complete copy of any analysis performed by VZ-MA or on VZ-MA's behalf within the last 2 years that analyses VZ-MA's ability to perform loop qualification for xDSL services in a fully or partially mechanized manner.

REPLY: Verizon MA objects to this request on the grounds that it is unduly burdensome, irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, Verizon MA provides the following response.

Verizon MA provides a fully mechanized loop qualification database. In addition, through the normal change management process, the CLECs have full access to any information on loop qualification mechanization upgrades or new offerings. In October, Verizon is planning to make loop makeup information which is in LFACS available on a mechanized basis.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-42 Please provide a detailed description of the process that any VZ-MA affiliate plans to use to determine if specific customers/customer locations qualify for retail xDSL service. Please provide a complete copy of whatever documentation any VZ-MA affiliate has developed for internal use that describes the current and planned future state of that process

REPLY: Verizon MA objects to this request on the grounds that it seeks information about an affiliated company that is irrelevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, Verizon MA provides the following response.

Verizon's data subsidiary has access to the same processes and databases as any other CLEC. Each of the CLECs and Verizon's subsidiary have their own processes and standards for utilizing this information and Verizon is not privy to that information. Verizon MA is not able to express an opinion concerning the process any subsidiary may "plan" to utilize.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-45 Assume that VZ-MA is about to plan and construct all-new outside plant facilities to serve a new business park and/or residential complex (creating new plant feeder and distribution routes from the ground up). In that circumstance please identify which database(s) VZ-MA would enter each of the following types of data into or indicate that the data would not be maintained in any electronic database or system.

- a. The location of splice points, Cable gauges, Cable lengths, FDI locations and types,
- b. Electronics locations and types, Bridge tap location and design, Repeater location and type,
- c. Availability of spare pair, Identification of cables, binder groups, pairs Presence and type of DLC,
- d. Location of serving area interfaces.

REPLY: In most instances, information on specific plant characteristics is identified in the following manner.

- a) Location of splice points - Paper plant location records.
Cable Gauges - Plant location records, (see below)
Cable lengths - Plant location records, (LMU in LFACs will provide cable length by gauge).
FDI location and types – Unclear as to what is meant by "type" - location is provided on plant location records, FDI name and address (by BA naming conventions) is contained in LFACs
- b) Electronics Locations and types - Types and cables/terminals served can be found in LFACS. Physical locations can be found on plant location records

REPLY: CC 3-45
(cont'd)

Bridge Tap location and design - Unclear as to what is meant by "design" – actual locations and lengths are in plant location records, location with respect to distance from CO may be found in LFACs
Repeater Location and Type - Plant location records.

c) Availability of spare pair - LFACS

Identification of Cables, Binder Groups, Pairs - Cable and Pair information is maintained on plant location records and in LFACs.

Binder Group identification is not maintained. The identification of the binder group is dependent on the size and type of cable involved.

Presence and type of DLC - See response to Electronics Locations and Types above

d) Location serving area interfaces - See response to FDI in (a) above.

Note: In the cases where fiber cable is used to serve an RT location, information as to gauge is not material. The fiber cable type, length, size, splice locations are shown on the plant location records. The cable inventory is maintained in TIRKS

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Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-46 Please provide a complete copy of the engineering methods and procedures, including record-keeping procedures, that VZ-MA would rely on to engineer and install new loop facilities, including but not limited to any outside plant engineering guidelines.

REPLY: Please see Verizon MA's responses to Information Requests ATT 3-5, CC 3-15 and CC 3-16.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: CLEC Coalition, Set #3

DATED: May 17, 2001

ITEM: CC 3-47 Please provide all responses to all other discovery requests, both past and future, provided by Verizon to other parties in this proceeding.

REPLY: No responsive answer is required.

VZ # 321